Inter-Agency Management Integration Team (IAMIT) Meeting Minutes July 19, 2012

Approval:	Deno	a	26	
	A. Hedge Ecology IA		epresentativ	ve

Date: 8, 16.12

Date: 8/16/12

Approval:

DOE RL IAMIT Representative

Approval: _

D. A. Fault Rod Lobos for EPA IAMIT Representative Donnis Faulk

Date: 8/16/12

Minutes Prepared by:

T. W. Noland

Mission Support Alliance, LLC

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Knox, K.*	KCR
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Shoemake, J.M.	CHPRC
Skinnarland, E.R.	Ecology
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Weil, S.R.	RL
Whalen, C.L.*	Ecology
Williamson, B.D.	RL
Administrative Record	
* Attendees	

Bland, N.M.	RL
Bohnee, G.	NPT
Call, P.K.	RL
Cameron, C.E.	EPA
Charboneau, B.L.	RL
Charboneau, S.L.	ORP
Cimon, S.	ODE
Cline, M.W.	RL
Dahl, S.L.	Ecology
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Donnelly, J.W.	WRPS
Dowell, J.A.*	RL
Einan, D.R.	EPA
Faulk, D.A.*	EPA
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Foley, B.L.	RL
Franco, J.R.	RL
French, M.S.	RL
Gadbois, L.E.	EPA
Grindstaff, J.F.	ORP
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Inter-Agency Management Integration Team (IAMIT) Meeting Minutes July 19, 2012

Key Documents/Issues List Review

DOE-RL noted that the format has been revised for CHPRC's key document list. The information is displayed two different ways -- chronologically for review date and grouped by area of decision. EPA pointed out that the first two documents on the chronological list for 100-NR-1 and 100-NR-2 should be Ecology leads and not dual leads. DOE-RL indicated that the correction will be made. DOE-RL noted that a concern has been expressed regarding the use of 100-K as a model for the rest of the Records of Decision (RODs), and suggested using the 100-K process for defining major issues as a template. DOE-RL added that the goal is to keep all the ROD formatting the same. It was noted that the time for EPA to conduct its regulatory review for 100-BC-1, -2 and -5 was less than 30 days, and the end date will be adjusted.

EPA stated that the expectation for the upcoming milestone negotiations is that DOE-RL will provide a compelling argument as to why a milestone date should be changed, and to provide hard dates with funding attached in lieu of TBD dates. EPA cited DOE-RL's decision to turn off the work associated with 100-K-1 which placed the milestone in jeopardy, and that the decision should have been made collectively with the Tri-Parties to move the milestone. Ecology agreed with EPA's position. DOE-RL acknowledged EPA's and Ecology's position and will communicate the expectation internally when planning milestone dates. EPA added that if there are hard milestone dates on the books, DOE-RL cannot come back and propose TBD dates. Ecology concurred with EPA's position.

DOE-RL noted that the asterisks indicate that the document review is open, and a note at the bottom of the page will be added for clarification. EPA indicated that the revised format for the CHPRC key documents list was acceptable.

ORP provided an updated key documents list. A list of recent documents submitted to the Administrative Record (AR) was also provided. Ecology noted that milestone M-047-06, due June 30, 2012, was missed by ORP. A \$5,000 penalty will be assessed for the first week the milestone is missed. Ecology stated that the milestone is to negotiate interim milestones and is not a milestone to be missed. Ecology noted that there are process steps within the Tri-Party Agreement (TPA) that provides protection when a milestone is to be missed or is going into dispute.

Extensions by Lead Regulatory Agency per Action Plan 9.2.1

EPA stated that the regulatory agencies are allowed to take extensions without approval from DOE-RL. The issue came up when DOE-RL sent a formal letter to Ecology granting approval for an extension.

EPA stated that the informal way of working on the proposed plans and feasibility studies (PP/FS) is not working, citing the 300 Area as an example. EPA suggested implementing a more formal process for DOE-RL to request extensions via letter, which would provide protection for DOE-RL by tracking the steps taken. EPA noted that a real formal system could delay the process for several years. DOE-RL agreed to consider a hybrid approach to a formal extension request process.

Ecological Preliminary Remediation Goals (PRGs)

DOE-RL initiated today's discussion from the standpoint of the meeting held last Friday (7/13/12) with DOE-RL, EPA and Ecology. EPA stated that its understanding at the end of the meeting was the agreement to use irrigation to set PRGs, and now there is confusion regarding DOE-RL's position. EPA stated that the inception of the issue was when DOE-RL unilaterally decided that the FS would not include irrigation in the rural residential exposure scenario to calculate PRGs. EPA disagreed with DOE-RL's decision and provided a comment. EPA stated that through the comment response, it made the decision to not go to dispute because the cleanup level was not going to change. EPA added that deep cleanup is driven by contaminants with very low kd's and irrigation doesn't make any difference.

EPA stated that the infiltration rate then became an issue because DOE-RL was adamant about using four millimeters. EPA countered with 16 millimeters, and the agencies couldn't come to an agreement. EPA stated that over the past six months, it was pointed out to DOE-RL that it was already screening against irrigation and has been using the same cleanup levels for 15 years.

EPA indicated that DOE-RL upper management does not understand what the agreement was at last Friday's meeting, but the cognizant DOE-RL project managers do communicate an understanding of the agreement. EPA referred to the e-mail that DOE-RL sent yesterday (7/18/12) indicating that irrigation would be used for PRGs, but the table for the infiltration rate will not be changed.

Ecology stated that it disagrees with DOE-RL's conceptual site model in the corrective measures study (CMS) for the four millimeters. Ecology added that during a meeting on irrigation at EPA a few months ago, DOE-RL agreed to send Ecology the draft information on infiltration for review. Ecology stated that DOE-RL then indicated that agreement had been reached and did not send Ecology the information. Ecology stated that the parameters used in the modeling for the cribs and trenches was requested in an e-mail in February 2012, and the information has never been received. DOE-RL stated that the four millimeters was the basis used in the Environmental Impact Statement (EIS). Ecology pointed out that the EIS was based on using a cap, and not a trench, which is the issue being discussed today. Ecology referred to the graded approach, and indicated that the understanding was that DOE-RL had concurred it would use the infiltration rates that were in the technical guidance document (TGD). EPA noted that the TGD can be used as a starting point, but it would not be used to select the numbers. Ecology indicated that a

request had been made for DOE-RL to provide a table showing the parameters for the graded approach, and the information has not been provided. EPA stated that the agreement during Friday's meeting was that if DOE-RL would not agree to make a change to the table, EPA would agree to the table showing four millimeters, with the footnote that the ROD will state that the table will reflect PRGs based on irrigation.

Ecology stated the understanding from the original irrigation study at EPA several months ago was that if there were a few sites that had some problems, the institutional controls (IC) for no irrigation would be applied to those sites. DOE-RL stated that the intent was to set up screening levels for irrigation and the PRGs for natural infiltration, and an IC would be triggered if a concentration ended up between those two. EPA responded that the same end point would be reached if irrigation is applied.

EPA provided DOE-RL some background regarding its position on ecological (eco) PRGs. EPA stated that over two years ago it had fundamentally disagreed with DOE-RL's proposal to do transition sampling for eco PRGs, and EPA directed its staff to not participate. EPA stated that DOE-RL had proposed to conduct a five to nine-year study, which EPA would not participate in, and that there are Model Toxics Control Act (MTCA) numbers that should be used. EPA added that it did not sign off on any work plans.

DOE-RL referred to the SEC activity that started in October 2010 and went through February 2011 to reach agreement on eco protection and the approach to soil cleanup values. EPA responded that all EPA and Ecology were working on during the SEC activity was to set a point of compliance for the eco protection, and noted that DOE-RL proposed ten and the MTCA default was 15. DOE-RL stated that there were several discussions related to the approach on the bioassays and the wildlife PRG development. DOE-RL added that there have been accelerated tier 1 and tier 2 eco PRG discussions with EPA and Ecology in the last four months because that was the path being used and what was contained in the RI/FS and proposed plans. EPA reiterated that the staff was given direction to not engage in the project and would not have approved a work plan. DOE-RL concurred that EPA did not approve a work plan.

DOE-RL stated that since it would take some time to approve the sampling analysis plan (SAP), the agreement among the Tri-Parties was to go forward and collect the data, albeit at risk. The data was collected, and the tier 1 and tier 2 data was submitted from June through November 2011 to the agencies. DOE-RL stated that Ecology submitted 22 pages of comments and no comment was received from EPA. EPA responded that no comments were generated because EPA staff had direction to not work on the reports. EPA stated that when it doesn't sign on to a document that DOE-RL has produced, and DOE-RL believes the document will feed into the RI/FS, it should not be assumed that EPA will accept the document. EPA added that if DOE-RL had reached agreement with Ecology, then EPA would accept the numbers. EPA noted that a credible eco risk assessment could not be completed on a site-specific basis, given the time frame the parties had.

DOE-RL noted that out of 22 pages of comments submitted by Ecology, the two remaining

issues to resolve are the toxicity reference value for uranium and the bioaccumulation factors. DOE-RL indicated that the issues could be resolved within an hour, and that the issue is not a technical issue but a policy issue. Ecology responded that it is a regulatory issue. Ecology noted that the bioaccumulation factors were mixed using site-specific factors and nonsite-specific factors taken from literature reviews, and Ecology headquarters does not want to set that precedence. DOE-RL stated that the Hanford data is at the low end of the range within the umbrella of the larger data, and therefore has the higher strength of analysis, including the larger data. DOE-RL added, as an example, that the Hanford data is up to 10 parts per million, and the National data is up to 100 parts per million. The resulting PRG is 100 parts per million which is within the calibration range for the bioaccumulation data. DOE-RL stated that using that data would not be extrapolating beyond the data for what is available, and it is showing that the Hanford data is within the range of information that is regionally or nationally available.

Ecology stated that the reviewers of the tier 1 and tier 2 documents did not agree with the values that were used because they did not agree with the reference material. Ecology noted that all of the reference material in the tier 1 and tier 2 documents was not available to Ecology. EPA stated that it is looking to Ecology to stand behind the credibility of the tier 1 and tier 2 documents and everything in the table before EPA would accept those into the ROD.

EPA ended the discussion by proposing that DOE-RL use the state screening levels already in MTCA, and use irrigation for PRGs. DOE-RL will discuss internally the issues and options raised today.



Thursday, July 19, 2012

Ecology Offices, Conference Room 3A/B 3100 Port of Benton Blvd Richland, Washington

Agenda

Inter-Agency Management Integration Team Meeting Chairperson: JD Dowell

10:30 a.m.	Key Documents/Issues List Review
10:40 a.m.	Extensions by Lead Regulatory Agency per Action Plan 9.2.1
10:50 a.m.	Ecological PRGs
11:10 a.m.	Adjourn Inter-Agency Management Integration Team Meeting

Inter-Agency Management Integration Team Meeting July 19, 2012

Name	Organization
Terry Noland	<u>msA</u>
Kathy Kny	Kny Court Reporting
J. A. Dowe (1	DOEKC
Jage Hedges	Ecology
Changluhalac	Ecology
Nina Menard	Ecology
TiPary Nov. 31	
DENNIS Faulk	EPA
	DOE-RL
Margo Vorgel JAMES LYNCH	DOE-ORP
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Lorna Dittmer	CHPRC
Buda Junken	Ecology
James A Hanse-	RL

CHPRC TPA Decision Document List by ROD Area

ROD Area	Document	Milestone	Due Date	Regulatory Review		Agency
200-EA-1	RFI/CMS & RI/FS Work Plan	M-015-92A	6/30/2015	7/1/2015	- 9/1/2015	Ecology
200-EA-1	TSD - Closure Plans for 207-A South Retention Basin, 216-A-29 Ditch, 216-A-37-1 Crib, and 216-B- 63 Trench	M-037-02	6/30/2014	5/16/2014	- 8/15/2014	Ecology
200-EA-1	200 East CP Inner Area Risk Assessment		TBD	TBD		Dual
200-EA-1 and 200-IS-1	CMS & FS Report(s) & PCAD(s)/PP(s)	M-015-92B	12/31/2016	7/1/2016	- 8/13/2016	Ecology
200-EA-1 and 200-IS-1	EE/CA Tier 2 Facilities - 200 West					Ecology
200-EA-1 and 200-IS-1	Record of Decision					Ecology
200-WA-1	200 West CP Inner Area Risk Assessment		TBD	TBD		Dual
200-WA-1 and 200-BC-1	FS/PP	M-015-91B	12/31/2015	1/1/2016	- 3/1/2016	EPA
200-WA-1 and 200-BC-1	Record of Decision					EPA
200-SW-2	RFI/CMS & RI/FS & PCAD/PP	M-015-93B	12/31/2016	1/2/2017	- 2/14/2017	Ecology
200-SW-2	Record of Decision					Ecology
200-PW-1/3/6, CW-5	RD/RAWP	M-016-125	9/30/2015	10/1/2015	-11/14/2015	EPA
200-CB-1	RI/FS work plan	M-085-10A	6/30/2014	7/1/2014	-8/31/2014	Ecology
200-CB-1	RI/FS and PP			TBD		Ecology
200-CB-1	Record of Decision			TBD		Ecology
200-CP-1	RI/FS work plan	M-085-20A	9/30/2015	10/1/2015	- 11/29/2015	Ecology
200-CP-1	RI/FS and PP			TBD		Ecology
200-CP-1	Record of Decision			TBD		Ecology
200-CR-1	RI/FS work plan	M-085-30A	12/31/2017	1/1/2018	-3/1/2018	EPA
200-CR-1	RI/FS and PP			TBD		EPA
200-CR-1	Record of Decision			TBD		Ecology
200-DV-1	RI/FS Work Plan	M-015-110A	3/31/2015	4/1/2015	-6/1/2015	Ecology
200-DV-1	FS/PP	M-015-110B	9/30/2015	9/30/2015	- 11/12/2015	Ecology
200-DV-1	Record of Decision	No Milestone				Ecology
200-CW-1, 200-CW-3, and 200-OA-1	FS/PP	M-015-38B	10/30/2014	11/1/2014	- 1/1/2015	EPA
200-CW-1, 200-CW-3, and 200-OA-1	Central Plateau Outer Area RI/FS work plan			TBD		EPA
200-CW-1, 200-CW-3, and 200-OA-1	RI/FS workplan SAP			TBD		EPA
200-CW-1, 200-CW-3, and 200-OA-1	RI/FS workplan Eco SAP			TBD		EPA
200-CW-1, 200-CW-3, and 200-OA-1	Record of Decision		TBD	TBD		EPA
200-CW-1, 200-CW-3, and 200-OA-1	Risk Assessment		N/A	TBD		Dual
200-CW-1, 200-CW-3, and 200-OA-1	TSDs - Closure Plan for 216-B-3 Main Pond and 216-S-10 Pond and Ditch	M-037-03	4/30/2013	5/1/2013	- 6/30/2013	Ecology
200-BP-5, 200-PO-1	200-BP-5 RI Report		9/30/2014	10/1/2014	-11/15/14	Ecology
200-BP-5, 200-PO-1	FS/PP	M-015-21A	6/30/2015	7/1/2015	-8/15/15	Ecology
100-BC-1, 100-BC-2, 100-BC-5	RI/FS Reports and Proposed Plan	M-015-68-T01	12/12/2012	12/13/2012	- 01/10/13	EPA
100-BC-1, 100-BC-2, 100-BC-5	Record of Decision			TBD		EPA
100-BC-1, 100-BC-2, 100-BC-5	Remedial Design / Remedial Action Work Plans			TBD		EPA
100-DR-1, 100-DR-2, 100-HR-1, 100- HR-2, 100-HR-3	RI/FS Reports and Proposed Plan	M-015-70-T01	12/15/2012	12/17/2012	-03/01/13	Ecology
100-DR-1, 100-DR-2, 100-HR-1, 100- HR-2, 100-HR-3	Record of Decision			TBD		Ecology
100-DR-1, 100-DR-2, 100-HR-1, 100- HR-2, 100-HR-3	Remedial Design/Remedial Action Work Plans			TBD		Ecology
100-FR-1, 100-FR-2, 100-FR-3, 100-IU- 2, 100-IU-6	RI/FS Reports and Proposed Plan	M-015-64-T01	12/28/2012	12/29/2012	-02/11/13	EPA
100-FR-1, 100-FR-2, 100-FR-3, 100-IU- 2, 100-IU-6	Record of Decision	Cale 6		TBD		EPA
2, 100-IO-I 100-FR-1, 100-FR-2, 100-FR-3, 100-IU- 2, 100-IU-6	Remedial Design / Remedial Action Work Plans			TBD		EPA
100-KR-1, 100-KR-2, 100-KR-4	Record of Decision		9/30/2012			EPA
100-KR-1, 100-KR-2, 100-KR-4	Remedial Design / Remedial Action Work Plans	THE LETT		TBD		EPA
100-NR-1, 100-NR-2	RI/FS Reports and Proposed Plan	M-015-62-T01	12/28/2012	12/29/2012	-02/11/13	Ecology
100-NR-1, 100-NR-2	Record of Decision			TBD		Dual
100-NR-1, 100-NR-2	Remedial Design / Remedial Action Work Plans			TBD		Ecology
100-NR-1, 100-NR-2	Interim Action Record of Decision Amendment			7/14/2010		Dual
100-NR-1, 100-NR-2	Remedial Design / Remedial Action Work Plan for Interim Action Record of Decision	M-015-60	3/29/2011	3/25/2011	- 8/3/2011* (Rev 1, Draft	Ecology
100-NR-1, 100-NR-2	Amendment (Rev. 1) 100-N Area Integrated Groundwater Sampling and Analysis Plan			6/2/2010	A) -8/3/2011**	Dual
300-FF-2, 300-FF-5	Record of Decision			TBD		EPA
300-FF-2, 300-FF-5	Remedial Design / Remedial Action Work Plans			TBD		EPA

Milestone Title	Milestone Tie	Document	TPA Milestone Due Date (if applicable) ¹	ORP Delivery to Regulators Date ²	Anticipated Regulatory Review Completion Date ³	Final Completion Date ⁴	DOE-ORP Lead	Contractor Lead	Ecology Lead	Comments/Issues
Submit to Ecology for review and approval as an Agreement primary document DOE's	M-045-60	Change Notice 2011-7 for the Phase 2 RFI/CMS Work Plan for WMA C, RPP-PLAN- 39114, Rev. 1B				06/06/12	C. Kemp	S. Eberlein	J. Lyon	Change Notice 2011-7 for the RFI/CMS Work Plan agreed upon by ORP and ECY and posted to the TPA Admin Record.
Phase 2 RFI/CMS Work Plan and Sampling and Analysis Plan (SAP) for WMA C	M-045-60	Change Notice 2011-6 for the SAP for Phase 2 Characterization of Vadose Zone Soil in WMA C, RPP-PLAN-3877, Rev. 2A				06/06/12	C. Kemp	S. Eberlein	J. Lyon	Change Notice 2011-6 for the SAP agreed upon by ORP and ECY and posted to the TPA Admin Record.
	Supports M-045-61	WMA C Characterization Summary 2011		TBD			C. Kemp	S. Eberlein	J. Lyon	 Feeds input for M-045-61 and all Closure Plans ORP met with ECY on 09/22/11 to provide status and setup meeting to discuss path forward.
Submit to Foology for Poving and Approval		WMA C Characterization Summary 2012		09/30/12			C. Kemp	S. Eberlein	J. Lyon	Feeds input for M-045-61 and all Closure Plans
Submit to Ecology for Review and Approval as an Agreement Primary Document, a Phase 2 RCRA Facility Investigation/Corrective	Supports	WMA C PA Initial Model Run Data Package		06/30/13			C. Kemp	S. Eberlein	J. Lyon	Feeds input for M-045-61 and all Closure Plans
Measure Study Report for WMA C	M-045-61	WMA C Characterization Summary 2013		09/30/13			C. Kemp	S. Eberlein	J. Lyon	Feeds input for M-045-61 and all Closure Plans
		WMA C PA Initial Document		09/30/13			C. Kemp	S. Eberlein	J. Lyon	Feeds input for M-045-61 and all Closure Plans
	M-045-61	Phase 2 RFI/CMS Report for WMA C	12/31/14	12/31/14			C. Kemp	S. Eberlein	J. Lyon	
Submit to Ecology for Review and Approval as an Agreement Primary Document, a Phase 2 Corrective Measures Implementation Work Plan for WMA C.	M-045-62	Phase 2 Corrective Measures Implementation Work Plan for WMA C	06/30/15	06/30/15			C. Kemp	S. Eberlein	J. Lyon	
Complete portions of the C-200 Closure Demonstration Plan necessary to complete closure plan development for the SST system.	M-045-80	Description of Radioactive Waste Determination Process	01/31/11	12/28/10	06/30/11		C. Kemp	S. Eberlein	J. Lyon	 Initial ORP letter, 10-TPD-166 sent to ECY on 12/28/10 ECY review extension to 04/18/11 received by ORP on 02/11/11. ORP extension acknowledgement letter 11-TF-031 sent to ECY on 02/23/11. 2nd ECY review extension letter 11-NWP-028 received by ORP on 04/20/11. 3rd ECY review extension letter 11-NWP-049 received by ORP on 06/02/11. ECY RCR received by ORP on 12/05/11 via letter 11-NWP-146. Extension for comment resolution to 03/15/12 per 01/12 PMM. ORP provided copies of the draft RPP-PLAN-47325 redline/strikeout revision in response to ECY's comments via email on 03/15/12. Per 03/27/12 PMM, ECY has agreed to respond within 30 days (04/27/12). Per the 04/24/12 PMM, ECY has agreed to provide a response to ORP by the end of May. ORP will provide a final production of the WIR document after ECY approves the final updates. The final document was released to the TPA AR on 07/18/12.

¹ "TPA Milestone Due Dates" are the direct regulatory drivers for completion of milestones.

² "ORP Delivery to Regulators Dates" are those dates that support future milestones, are submittal dates for permitting activities, or miscellaneous submittals that support ORP actions and represent the dates when ORP submits documents to the regulators. ORP Delivery to Regulators Dates may be earlier than TPA Milestone Due Dates if work is completed ahead of schedule.

The "Anticipated Regulatory Review Completion Date" is generated based on TPA Milestone Agreements and TPA Section 9.0 documentation requirements for primary documents. This date will be changed and noted in "Comments/Issues" if extension of review is requested. If the document is a secondary document or for information only, the "Anticipated Regulatory Review Completion Date" may be listed as "N/A" for not applicable.

⁴ "Final Completion Date" is entered after the document is reviewed, comments are incorporated, and any disputes are resolved. Any comment resolution issues or disputes will be noted under "Comments/Issues."

Milestone Title	Milestone Tie	Document	TPA Milestone Due Date (if applicable) ¹	ORP Delivery to Regulators Date ²	Anticipated Regulatory Review Completion Date ³	Final Completion Date ⁴	DOE-ORP Lead	Contractor Lead	Ecology Lead	Comments/Issues
Implement and Complete All Remaining Activities in the June 6, 2007 C-200 Closure Demonstration Plan (with any revisions as agreed to by Ecology and DOE).	Supports M-045-81 (S)	Pipeline Feasibility Study, RPP-RPT-45723		12/28/10	06/01/11	07/02/12	C. Kemp	S. Eberlein	J. Lyon	 Feeds input to M-045-81. Initial ORP letter 10-TPD-166 sent to ECY on 12/28/10 ECY review extension to 04/18/11 received by ORP on 02/11/11 ORP extension acknowledgement letter 11-TF-031 sent to ECY on 02/23/11 2nd ECY review extension letter 11-NWP-028 received by ORP on 04/20/11. ECY RCR letter 11-NWP-052 received by ORP on 06/03/11. ORP sent comment response extension letter 11-TF-067 on 06/16/11 to ECY to extend final response date to 09/25/11. In October 2011 PMM ECY/ORP agreed to extension to 12/05/11. Extension for comment resolution to 03/15/12 per 01/12 PMM. ORP provided a disc containing files for the RCRs, the revised report, and two new cost appendices to ECY via email on 03/15/12. ECY and ORP agree (per 04/24/12 PMM) to meet in May to discuss comment resolution and extend the final resolution to the end of June. ORP and ECY aim to reach final resolution and release the revised document in July. The final document was released to the TPA AR on 07/02/12.
	M-045-81	Other Closure Demonstration Deliverables	09/30/14				C. Kemp	S. Eberlein	J. Lyon	
	M-045-91F- T01	Provide Report of the Liquid Leak Rate Assessments	01/31/13	01/31/13			J. Johnson	R. Gregory	J. Lyon	Moved to 01/31/13 per M-45-12-01 TPA Chg Pckg.
	M-045- 91D-T01	Provide Report on the Concrete Dome Samples from Tank C-107 Plug	05/31/13	05/31/13			J. Johnson	R. Gregory	J. Lyon	
	M-045-91F- T02	Provide Report of Liner Failures for SSTs	07/31/13	07/31/13			J. Johnson	R. Gregory	J. Lyon	
	M-045-91F- T04	Provide Report on 100-Series SSTs as having Leaked in RPP-32681	07/31/13	07/31/13			J. Johnson	R. Gregory	J. Lyon	
	M-045- 91G-T03	Provide AOR Final Doc. for SSTS on 1,000,000 Gallon Tanks	09/31/13	09/31/13			J. Johnson	R. Gregory	J. Lyon	Moved to 09/31/13 per M-45-12-01 TPA Chg Pckg.
M-45-91 Interim Milestones and Target Dates for SSTs Implementing the Expert Panel's	M-045-91E	Provide SST Farms Dome Deflection Surveys Every Two Years	09/30/13	09/30/13			J. Johnson	R. Gregory	J. Lyon	
Recommendations (created via TPA Change Request CR M-45-10-01, approved on 01/03/2011)	M-045- 91G-T04	Provide AOR Final Doc. for SSTS on 55,000 Gallon Tanks	10/31/13	10/31/13			J. Johnson	R. Gregory	J. Lyon	
	M-045-91F	Provide Summary Conclusions Report on Leak Integrity	12/31/13	12/31/13			J. Johnson	R. Gregory	J. Lyon	
	M-045-91G	Provide Summary Conclusions Report of AOR for SSTs	04/30/14	04/30/14			J. Johnson	R. Gregory	J. Lyon	
,	M-045-91B- T01	Provide Ecology report on the Concrete Core from TankA-106 or alt	09/30/14	09/30/14			J. Johnson	R. Gregory	J. Lyon	
	M-045-91H	Submit Change Pckg (if necessary) to est. Additional Milestones	07/31/15	07/31/15			J. Johnson	R. Gregory	J. Lyon	
	M-045-91I	Provide IQRPE Certification of SSTs Structural Integrity	09/30/18	09/30/18			J. Johnson	R. Gregory	J. Lyon	

Milestone Title	Milestone Tie	Document	TPA Milestone Due Date (if applicable) ¹	ORP Delivery to Regulators Date ²	Anticipated Regulatory Review Completion Date ³	Final Completion Date ⁴	DOE-ORP Lead	Contractor Lead	Ecology Lead	Comments/Issues
Prior to beginning construction and at least one year before construction is to be	M-045-92O	Future Barrier Design 3	06/30/15	06/30/15			C. Kemp	S. Eberlein	J. Lyon	ORP/ECY TPA Change Package M-45-12-04 modified this to a due date of 06/30/15 dependent on discussions per M-045-22.
complete, DOE will submit to Ecology a final design and monitoring plan for each interim barrier.	M-045-92P	Future Barrier Design 4	06/30/16	06/30/16			C. Kemp	S. Eberlein	J. Lyon	ORP/ECY TPA Change Package M-45-12-04 modified this to a due date of 06/30/16 dependent on discussions per M-045-22.
Submit to Ecology as an Agreement Primary Document a report on all Catch Tanks and associated pipelines that are identified in the SST System Part A, or otherwise used in operations.	M-045-101 (P)	SST System Component Identification and Proposed Closure Strategy (RPP-PLAN- 41977)	12/27/10	12/28/10	05/30/11		C. Kemp	S. Eberlein	J. Lyon	 Initial ORP letter 10-TPD-176 sent to ECY on 12/28/10 ECY letter for extension to 04/18/11 received by ORP on 02/11/11 ORP extension acknowledgement letter 11-TF-031 sent to ECY on 02/23/11 2nd ECY review extension letter 11-NWP-028 received by ORP on 04/20/11. ECY RCR letter 11-NWP-052 received by ORP on 06/02/11. ORP sent comment response extension letter 11-TF-067 on 06/16/11 to ECY to extend final response date to 08/31/11. In October 2011 PMM ECY/ORP agreed to extension to 12/05/11. Comments to RCR and redline provided to ECY on 11/14/11. Extension for comment resolution to 03/15/12 per 01/12 PMM. ECY and ORP agree (per 04/24/12 PMM) to meet in May 2012 to discuss comment resolution and extend the final resolution to the end of June. ORP and ECY have reached final resolution and extended the due date to 07/31/12 to incorporate final changes.
Waste Supplemental Treatment Report	M-062- 40ZZ	Submit One Time Tank Waste Supplemental Treatment Tech. Report	10/31/14	10/31/14			S. Pfaff	C. Burrows	D. McDonald	
Technology Selection Report	M-062-45- ZZ	Technologies Selection Report	04/30/15	04/30/15			S. Pfaff	C. Burrows	D. McDonald	
Complete final design and submit RCRA Part B Permit Modification Request	M-062-31- T01	RCRA Part B Permit ModificationFinal Design	04/30/16	04/30/16			S. Pfaff		D. McDonald	

Topic Areas	Document	ORP Delivery to Regulators Date ¹	Anticipated Regulatory Review Completion Date ²	Final Completion Date ³	DOE-ORP Lead	Contractor Lead	Regulator Lead	Comments/Issues
	Tier 1 Framework Closure Plan Update	06/30/13			C. Kemp	S. Eberlein	J. Lyon	
	Tier 2 WMA C Closure Plan	06/30/13			C. Kemp	S. Eberlein	J. Lyon	
	All Remaining Closure Plans for WMA C	09/30/15			C. Kemp	S. Eberlein	J. Lyon	
	WMA C Closure Conceptual Design	TBD			C. Kemp	S. Eberlein	J. Lyon	
	Tier 3 Closure Plans for Tanks Already Received	TBD			C. Kemp	S. Eberlein	J. Lyon	Due 120-day post EIS
	Tier 3 Closure Plans for Additional Tanks	TBD			C. Kemp	S. Eberlein	J. Lyon	Several Dates in out years
DEDMIT DOOLINENTO	WMA C Closure Design	TBD			C. Kemp	S. Eberlein	J. Lyon	Final dates not yet determined
PERMIT DOCUMENTS	Supplemental Treatment Technology Notice of Construction	09/30/13			L. Huffman	F. Miera	J. Lyon	
	Submit Part B Permit Application for Selected Supplemental Treatment Technology	09/30/13			L. Huffman	F. Miera	J. Lyon	
	Wiped Film Evaporator Notice of Construction	09/30/14			L. Huffman	F. Miera	J. Lyon	
	Submit Wiped Film Evaporator Class 3 Permit Modification or Part B Permit Application	09/30/14			L. Huffman	F. Miera	J. Lyon	
	IDF Performance Assessment (ORP/WRPS has support role to RL/CHPRC)	09/30/12			T. Fletcher	F. Miera	J. Lyon	
MICCELLANICOLIC	Submit Categorical TOC HIA	TBD				F. Miera	J. Lyon	
MISCELLANEOUS DOCUMENTS	Quarterly Hose-In-Hose Transfer Lines (HIHTL) Reports	Ongoing Quarterly			J. Johnson		J. Lyon	 Back-reports submitted via email to ECY, formal letter 11-TPD-024 transmitted back reports to ECY on 03/29/11 Meeting to evaluate extension of 2 HIHTL Reports held 05/25/11.

¹ Note: "ORP Delivery to Regulators Dates" are those dates that support future milestones, are submittal dates for permitting activities, or miscellaneous submittals that support ORP actions and represent the dates when ORP submits documents to the regulators.

² Note: The "Anticipated Regulatory Review Completion Date" is generated based on TPA Milestone Agreements and TPA Section 9.0 documentation requirements for primary documents. This date will be changed and noted in "Comments/Issues" if extension of review is requested. If the document is a secondary document or for information only, the "Anticipated Regulatory Review Completion Date" may be listed as "N/A" for not applicable.

Note: "Final Completion Date" is entered after the document is reviewed, comments are incorporated, and any disputes are resolved. Any comment resolution issues or disputes will be noted under "Comments/Issues."